

**REMARKS**

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

**Disposition of Claims**

Claims 1-6 are pending in this application. Claims 1, 2, and 4 are independent. The remaining claims depend, directly or indirectly, from claims 1, 2, and 4.

**Rejection(s) under 35 U.S.C. § 103**

Claims 1, 2, 3, and 5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,097,361 issued to Childers et al. (hereinafter "Childers") in view of U.S. Patent No. 5,278,818 issued to Zucker et al. (hereinafter "Zucker") and Japanese Patent No. 58178676 A issued to Kataoka (hereinafter "Kataoka"). Independent claim 1 has been amended to clarify that the diodes are parallel-connected to *an input line of* the focusing coil. Further, independent claim 2 has been amended to clarify that there is one semiconductor is connected to *an input line of* the focusing coil and one semi-conductor connected to *an input line of* the tracking coil. Support for all the aforementioned amendments may be found, for example, in Figure 1 and paragraphs [0019]-[0022] of the instant application. To the extent that this rejection still applies to the amended and non-amended claims, the rejection is respectfully traversed.

At the outset, the Applicant respectfully maintains that there is no motivation to combine the teachings of Childers with that of Zucker and/or Kataoka for the at least the reasons outlined in the Response filed on July 21, 2004. Moreover, even assuming

*arguendo* that these references are properly combinable, the references fail to render the claims, as amended, obvious.

Childers, in view of Zucker and Kataoka, does not teach or suggest all the limitations of amended independent claims 1 and 2. Specifically, with respect to Childers, it is admitted by the Examiner that Childers fails to disclose any coil protection features, and certainly does not disclose two diodes or semiconductor devices connected in parallel to an input line of a coil as required by independent claims 1 and 2. It is also admitted that Childers fails to disclose an input voltage not lower than a predetermined voltage being led to the ground by the two diodes devices as required by independent claims 1 and 2 of the present application. Further, neither Zucker nor Kataoka teach that which Childers lacks.

Specifically, Zucker fails to teach or suggest two diodes that are parallel-connected to an input line of said focusing coil. Rather, the circuit shown in Figure 1 of Zucker, only shows one diode (D2) connected to the input line of the coil (L). The Applicant respectfully asserts that the second diode (D1) shown in Figure 1 is not connected to the input line of the coil (L) because the second diode (D1) is separated from the input line of the coil (L) by a connection to ground. Moreover, Zucker does not teach or suggest a semiconductor connected to an input line of the focusing coil and to an input line of the tracking coil. In fact, Zucker is wholly silent as to any semiconductor.

Kataoka also fails to teach or suggest two diodes that are parallel-connected to an input line of a focusing coil. In particular, the diode (22) that was asserted to be connected in parallel to the coil (15) is, in fact, not connected in parallel to the coil (15). An analysis of the circuit shown in Figure 3 of Kataoka reveals that coil (15) *cannot* be considered to be connected in parallel to the diode (22) because the diode (22) and the coil (15) are separated by choke coil (23). Thus, the voltage difference between the diode (22) and ground (associated with the diode (22)) is not the same as the voltage difference between the coil (15) and ground associated with the coil (15). Because the voltage difference across the two paths is not the same, the coil (15) and the diode (22) cannot be

considered to be connected in parallel. Moreover, Kataoka does not teach or suggest a semiconductor connected to an input line of the focusing coil and to an input line of the tracking coil. In fact, Kataoka is wholly silent to any semiconductor.

In view of the above, Childers, Zucker, and Kataoka, whether viewed separately or in combination, do not teach all of the limitations of amended independent claims 1 and 2. Thus, amended independent claims 1 and 2 are patentable over Childers, Zucker, and Kataoka. Dependent claims are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 4 and 6 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Childers in view of Zucker. Independent claim 4 has been amended to clarify that the diodes parallelly-connected to *an input line of* the coil (either focusing and/or tracking coil). Support for the aforementioned amendment may be found, for example, in Figure 1 and paragraph [0019]-[0022] of the instant application. To the extent that this rejection still applies to the amended and non-amended claims, the rejection is respectfully traversed.


Independent claim 4 includes at least the same limitations discussed above as not taught or suggest by Childers or Zucker. Accordingly, claim 1 is patentable over Childers and Zucker for at least the same reasons as independent claim 1 above. Dependent claim 6 is patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

## Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 04995/049001).

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Respectfully submitted,

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